

SUMMARIES OF DOCUMENTS OBTAINED FROM U.S. EPA

Formulated Products

Renninger, Steven L. U.S. EPA, Action Memorandum – Request for a Removal Action at the Formulated Products Site, Clyde, Sandusky County, Ohio (Site I.D. #KY), 17, May 1994.

- States the purpose of the Memorandum is to request & document approval to expend \$665,960 to abate the imminent threat identified on the Site, which consists of corrosive, ignitable and oxidizer wastes in abandoned drum located on the Site.
- States that the response action will consist of the following: 1) securing the site to prevent public access, 2) conduct a site assessment to characterized the drums on the Site, 3) stabilization of hazardous wastes to allow for their removal and off-site disposal. The time critical removal is estimated to last 30 days.
- The Action Memo describes the present site conditions and provides a historical background description of local, State and Federal agency actions with regards to the hazardous materials/wastes on the Site.
- The historical background description notes that the U.S. EPA had noted in a March 1994 site investigation, that drums were noted to have leaked or spilled waste throughout the facility. The site investigation confirmed the presence of corrosive waste streams on the Site.
- The historical background description noted that in April 1994, further sampling of site wastes by U.S. EPA & TAT personnel verified the existence of incompatible oxidizers.
- The Action Memo documents several specific conditions on the Site which present an imminent and substantial threat to human health, welfare and the environment. These conditions include: Actual or potential exposure of human population, animals or the food chain from hazardous substances, pollutants or contaminants present on the Site; Hazardous substances, pollutants or contaminants in drums and other containers on site may pose a threat of release; Weather conditions that may cause hazardous substances, pollutants or contaminants to migrate or be released; the threat of fire or explosion due to the presence of incompatible substances on site.
- The Action Memo listed the proposed removal actions: Implement a health & safety plan, establish site security, Identify, inventory and characterize hazardous wastes followed by stabilization and off-site disposal of all surficial hazardous wastes. The estimated removal project ceiling estimate was \$665, 960.

Renninger, Steven L. U.S. EPA, Pollution Report (POLREP) #1, 16 June 1994

- POLREP #1 provides some background information concerning the reason why the U.S. EPA is involved in conducting a removal action on this site.
- POLREP #1 summaries the actions taken with regards to the Site between 18 April 1994 to 16 June 1994.

- Removal activities initiated during this time period include the mobilization of EQM/Samsel (removal contractor) to the site and the installation of temporary security fencing around the perimeter of the site. The removal action budget expended to date is \$15,236.00.

Renninger, Steven L. U.S. EPA, Pollution Report (POLREP) #2, 17 June 1994

- POLREP #2 provides some background information concerning the reason why the U.S. EPA is involved in conducting a removal action on this site.
- POLREP #2 summarizes the actions taken with regards to the Site between 17 June 1994 to 24 June 1994.
- Site activities include drum sampling & stabilization; inventory of chemical containers in the laboratory area of the site facility; inventory of drums locked on the site; establishment of a drum staging area in B1 warehouse; stabilization and transfer of acid drums into poly drums; completion of HazCat operations; consolidation of caustic solids.
- On-site waste streams identified, which include: Base solids, cylinders, acid liquid, base liquid, flammable liquid, flammable solid, neutral solid, neutral liquid, PCB capacitors and lab waste. A meeting was held on 24 June 1994 with US EPA, Technical Assistance Team (TAT) and EQM T&D coordinator to review HazCat results and to review waste streams.
- Future tasks were identified as including continual site security, completion of waste stream consolidation and arranging off-site disposal.

Renninger, Steven L. U.S. EPA, Pollution Report (POLREP) #3, 27 June 1994

- POLREP #3 provides some background information concerning the reason why the U.S. EPA is involved in conducting a removal action on this site.
- POLREP #3 summarizes the actions taken with regards to the Site between 27 June 1994 to 30 June 1994.
- Site activities included continued bulking of caustic solids; continuation of lab pack operations; consolidation of neutral solids; completely clearing Building 3 of debris and drums; waste stream samples sent to offsite laboratory for disposal analysis.

Renninger, Steven L. U.S. EPA, Pollution Report (POLREP) #4, 5 July 1994

- POLREP #4 provides some background information concerning the reason why the U.S. EPA is involved in conducting a removal action on this site.
- POLREP #4 summarizes the actions taken with regards to the Site between 5 July 1994 to 14 July 1994.

- Actions taken during this time period include: Clearance and decontamination of Building 3; pumped liquid pit contents into holding tank for pending disposal; completed consolidation of flammable solids and neutral liquids; over pack glycol ether drum; transported PCB capacitors, glycol ether drum for off-site disposal; cleaned out outside pits and encapsulated open pit with concrete; decontaminated floor in office and lab areas of facility building; suspect asbestos tank covered and re-staged inside of building; pit sludge transported for off-site stabilization and disposal.

Renninger, Steven L. U.S. EPA, Pollution Report (POLREP) #4, 20 July 1994

- POLREP #5 provides some background information concerning the reason why the U.S. EPA is involved in conducting a removal action on this site.
- POLREP #4 summarizes the actions taken with regards to the Site between 20 July 1994 to 17 August 1994.
- On July 20, 1994, additional “No Trespassing” signs posted on site.
- On August 3, 1994, 3500 gallons of neutral liquids transferred to tanker for off-site disposal
- On August 17, 1994, Roll-off boxes containing neutral solids and base solids transported off-site for disposal. Acid liquid, base liquid, flammable solid, flammable liquid, lab packs, and oxidizer drums (34 total) transported for off-site disposal. All site disposal activities concluded on this date.

Ecology & Environment, Inc., Site Assessment Report for Formulated Products, Clyde, Sandusky County, Ohio, Document Control Number TAT-05-23-04009, 11 May 1994

- The report provides a detailed site description of the property, site facility structures and surrounding properties. The report also provides a brief hydrological and geological description of the site.
- The report provides a detailed description of the site’s history, which includes an environmental compliance history.
- The report provides a summary of site reconnaissance conducted by U.S. EPA and TAT personnel on 29 March 1994 and 31 March 1994. During this site visit conditions on the site were documented and a strategy for the formal site assessment was developed.
- The report provides a detailed description of the site assessment, which was conducted on 31 March 1994 and 11 April 1994.
- The site is an abandoned industrial cleanser manufacturing facility, which was in operation from 1971 to 1989. The site consists of a warehouse, office, maintenance and processing areas

contained inside eight single and multiple story structures (labeled B1 through B8) clustered together. There are also two banks of metal silos located on the northeast end of the facility.

- At the time of the site visit the Ohio EPA had informed the U.S. EPA of the presence of 100 – 200 drums and an indefinite number of smaller chemical containers. The majority of the chemicals onsite are believed to be related to manufacturing soaps and detergents.
- The Ohio EPA provided U.S. EPA with an inventory of chemicals found on site which include caustic soda, sodium perborate, sodium silicate, ethylene glycol and an assortment of lab chemicals.
- Section 3.2 details the site visit observations. This includes a detailed description of the construction of each of the 8 facility buildings. This section also describes the quantity and type of chemical containers found in each of the structures. Building 3 appears to house the majority of the drums and other containers located on the site.
- Section 3.3 details the sampling activities. Eight drum samples were collected and analyzed for pH, flashpoint and VOCs. The laboratory results indicated the presence of materials with extreme pH's and low flashpoint, which pose threats to human health & the environment.
- An additional three samples of wall and ceiling material in building B1 was collected and analyzed for asbestos. The laboratory results indicated that no asbestos fibers were found in the three samples.
- Section 5.0 provides a description of the potential threats associated with the site and have been listed in the U.S. EPA Action Memo.

Renninger, Steven L. U.S. EPA, On-Scene Coordinator' Report, CERCLA Removal Action, Formulated Products Site, Clyde, Sandusky County, Ohio, Site ID #KV, Removal Dates: June 14, 1994 to August 17, 1994

This report summarizes the removal actions taken by the U.S. EPA and its contractors from June 14, to August 17, 1994. The actions included the following activities:

- TAT conducted field HazCat tests which identified nine waste streams including base liquid, base solids, neutral liquids, neutral solids, flammable liquids, flammable solids, base oxidizers, neutral oxidizers and acid liquids. An additional five waste streams were identified based upon their physical characteristics: metal shavings, contaminated wood pallets, general debris, gas cylinders and PCB-contaminated capacitors.
- Drums of base, acid and flammable liquid wastes were consolidated and transported for disposal;
- Drums of oxidizers and flammable solids were consolidated and transported for disposal;

- Base solids were bulked into roll-off boxes and transported for off-site disposal;
- Neutral solids were bulked into roll-off boxes and transported for off-site disposal;
- Non-hazardous sludge was pumped from a pit and transported for disposal. Pits and trenches were filled in with concrete;
- RCRA empty drums were crushed and consolidated for disposal;
- A drum of glycol ether was over packed and transported for disposal;
- Four PCB capacitors were also over packed and transported for disposal;
- Two acetylene, two oxygen, one anhydrous ammonia and two propane cylinders were transported off site to be evacuated, devalved and destroyed on June 30, 1994.
- Two roll-off boxes (10 cu. yds each) and one 15 cubic yard roll-off box containing corrosive solids was transported for off-site disposal;
- 15 cubic yards of non-regulated, non-hazardous solids was transported to EnviroSafe for disposal;
- 1,400 pounds of hazardous waste solids was transported to EnviroSafe for stabilization and disposal;
- 550 gallons of waste flammable liquids was transported offsite for fuel blending;
- 660 gallons of waste corrosive liquids (sodium hydroxide) and 165 gallons of waste corrosive liquids (chromium) was transported off-site for neutralization;
- One, 15-gallon lab pack of waste pesticides, one, 5-gallon lab pack of pesticides (pyrethrins) for incineration;
- 400 pounds of waste oxidizing substance, solid, corrosive and 400 pounds of waste oxidizing substance, solid were transported for off-site chemical oxidation and precipitation.
- All wastes were transported off site for final disposal by August 17, 1994.
- ERCS subcontractor decontaminated the floor of Building 3 to remove the extensive buildup of caustic material.